

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In Re:	)	
Mary Belford Smith,	)	Case No. 08-48253-659
Debtor,	)	Chapter 13
	)	
	)	
GRP Financial Services,	)	<b>RESPONSE TO SECOND</b>
	)	<b>NOTICE OF DEFAULT</b>
	)	
Movant,	)	
	)	
vs.	)	David T. Lumerman
	)	1221 Locust Street, Suite 1000
	)	St. Louis, MO 63103
Mary Belford Smith,	)	Phone: 314-421-3313
Debtor, and	)	Fax: 314-421-5188
John V. LaBarge, Trustee,	)	dlumerman@sbcglobal.net
Respondents.	)	MO Bar #24602, EDMO #30773

**RESPONSE TO SECOND NOTICE OF DEFAULT**

COMES NOW Debtor, by and through Counsel, and for her Response to the Second Notice of Default filed by GRP Financial Services, states to the Court as follows:

1. Debtor states she has made the September 2009, post-petition mortgage payment and will make the October 2009, post-petition mortgage, payment shortly.

WHEREFORE, Debtor prays that the relief sought by GRP Financial Services, be denied, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ David T. Lumerman  
David T. Lumerman  
Attorney for Debtor(s)  
1221 Locust St., Suite 1000  
St. Louis, MO 63103  
(314) 421-3313 (Telephone)  
(314) 421-5188 (Facsimile)  
dlumerman@sbcglobal.net  
MO Bar #24602, EDMO #30773

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Response to Second Notice of Breach was served upon the following, either electronically via the Court's ECF system, or via regular US Mail, this October 14, 2009:

John V. LaBarge, Jr.  
Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, MO 63143

Office of the US Trustee  
111 South 10<sup>th</sup> Street, Suite 6353  
St. Louis, MO 63102

Martin, Leigh, Laws & Fritzlen, PC  
1044 Main Street, Suite 900  
Kansas City, MO 64105

Mary Belford Smith  
9532 Stansberry  
St. Louis, MO 63134

/s/ David T. Lumerman  
David T. Lumerman  
Attorney for Debtor(s)  
1221 Locust St., Suite 1000  
St. Louis, MO 63103  
(314) 421-3313 (Telephone)  
(314) 421-5188 (Facsimile)  
dlumerman@sbcglobal.net  
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